

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER)
of the NEW ENGLAND TEAMSTERS AND)
TRUCKING INDUSTRY PENSION FUND)
)
Plaintiff,)
)
v.)
)
EAGLE GRAPHICS, INC and)
JOSEPH BENDER, in his capacity as President)
of Eagle Graphics, Inc.)
)
Defendants,)
)

C.A. No. 04-12509 DPW

**AFFIDAVIT OF PLAINTIFF'S ATTORNEY, CATHERINE M. CAMPBELL,
IN SUPPORT OF MOTION FOR APPROVAL OF TRUSTEE PROCESS
FOR BANK ACCOUNT ATTACHMENT**

I, Catherine M. Campbell, am the attorney for Plaintiff in the above-entitled matter and say of my own knowledge in support of this motion that:

1. This is a civil action brought pursuant to the Employee Retirement Income Security Act Section 515, 29 U.S.C. §1145 for collection of withdrawal liability.
2. Plaintiff has a meritorious cause of action and there is a reasonable likelihood that a judgment will be recovered in the amount of \$229,537.62. This amount includes the principal in the amount of \$152,215.00 for withdrawal liability, \$15,275.78 in interest charges, \$30,443.00 in liquidated damages and \$31,603.84 in attorneys' fees and costs. These damages are mandatory pursuant to ERISA § 515, 29 U.S.C. § 1145 and ERISA § 502(g)(2), 29 U.S.C. 1132(g)(2).

Upon information and belief, there are presently monies or credits due said defendant in the hands and possession of Bank of America, Trustee, Boston, MA, Account No.: 0094 1920 2059.
3. The undersigned certifies that I know of no liability insurance available to satisfy

the judgment.

4. Plaintiff knows of no legal defenses to this action.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 13th DAY OF APRIL, 2006.

/S/ Catherine M. Campbell
Catherine M. Campbell